
EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

THE TRUSTEES OF PURDUE
UNIVERSITY,

Plaintiff,
v.

STMICROELECTRONICS N.V.,
STMICROELECTRONICS
INTERNATIONAL N.V., and
STMICROELECTRONICS, INC.,

Defendants.

CIVIL ACTION NO. 6:21-CV-00727-ADA

JURY TRIAL DEMANDED

**PLAINTIFF'S THIRD SET OF DISCOVERY TO
DEFENDANT STMICROELECTRONICS, INC.**

Plaintiff, The Trustees of Purdue University (“Plaintiff” or “Purdue”), propounds the following discovery to Defendant STMicroelectronics, Inc. (“Defendant”) under Federal Rules of Civil Procedure 26, 33 and 34, which set forth the requirements for answering. All responsive information should be provided to Shore Chan LLP, 901 Main Street, Suite 3300, Dallas, Texas 75202.

1. In this document, “**STPOWER SiC MOSFET(s)**” means and includes all products and solutions marketed or distributed under any of the following part numbers as well as any other **SiC Semiconductor Products** (defined below): SCTH50N120-7, SCT10N120H, SCTWA50N120-4, SCTWA50N120, SCTWA30N120, SCTWA20N120, SCTWA10N120, SCT50N120, SCT30N120, SCT30N120H, SCT1000N170, SCT1000N170AG, SCT10N120AG, SCT20N120, SCT10N120, SCT20N120AG, SCT20N120H, SCT20N170, SCT20N170AG; all products and solutions marketed or distributed under any of the following part numbers: SCTWA35N65G2VAG, SCTL35N65G2V, SCTH100N65G2-7AG, SCTH35N65G2V-7,

SCTH35N65G2V-7AG, SCTH90N65G2V-7, SCTH70N120G2V-7, SCTH60N120G2-7, SCTH40N120G2V7AG, SCTH40N120G2V-7, SCTW100N65G2AG, SCTW70N120G2V, SCTW35N65G2V, SCTW35N65G2VAG, SCTW90N65G2V, SCTWA35N65G2V, SCTWA90N65G2V, SCTWA90N65G2V-4, SCTWA70N120G2V-4, SCTWA60N12G2-4AG, SCTWA60N120G2AG, SCTWA60N120G2-4, SCTWA40N12G24AG, SCTWA40N120G2V, SCTWA40N120G2V-4, SCTWA35N65G2V4AG, SCTWA35N65G2V-4, SCTW60N120G2, SCTW60N120G2AG, SCTW40N120G2V, SCTW40N120G2VAG, SCTW35N65G2V, SCTW100N120G2AG, SCTL90N65G2V; all products and solutions marketed or distributed under any of the following part numbers: SCT011H75G3AG, SCT040H65G3AG, SCT040H65G3SAG, SCT040HU65G3AG, SCT055HU65G3AG, and SCT070H120G3AG; all silicon carbide Power MOSFETs marketed or distributed under the STPOWER name or mark; and any other silicon carbide Power MOSFETs marketed or distributed by an STMicroelectronics entity at any time since March 3, 2009. This definition includes all products identified on the following website: <https://www.st.com/en/sic-devices/sic-mosfets.html>. The phrase “STPOWER name or mark” in this definition encompasses: the word mark registered with the USPTO under serial number 79274308 (https://tsdr.uspto.gov/#caseNumber=79274308&caseSearchType=US_APPLICATION&caseType=DEFAULT&searchType=statusSearch); the word mark registered with the USPTO under serial number 79181494 (https://tsdr.uspto.gov/#caseNumber=79181494&caseSearchType=US_APPLICATION&caseType=DEFAULT&searchType=statusSearch); marks consisting of the wording “STPOWER” under the design of highly stylized power button symbol comprised of an incomplete circular band with a diagonal bar appearing in the open space at the top of the broken circle; marks consisting of a shaded brown circle having a design of two interlocked chain links superimposed thereon where the chain links are displayed in white with the

wording “STPOWER” displayed in white superimposed on the circular design below the chain link design; and any other mark comprising the wording “STPOWER.”

2. “**Identify**” or “**Identity**” when it comes to a person means their full name, employer, phone number, job description, physical home/work addresses and email address; sufficient information to contact the person.

3. “**Testing Data**” means scanning electron microscope images, doping profiles, measurements, wafer tests, die tests, die sort testing, probe testing, warpage testing, reverse engineering, and destructive testing. **Testing Data** includes any reports that refer to or incorporate **Testing Data**.

4. “**SiC Semiconductor Products**” means any power semiconductor device (e.g. MOSFET) made, used, imported, offered for sale or sold in the United States or its territories by **STMicroelectronics, Inc.** that includes an SiC layer.

5. “**STMicroelectronics, Inc.**” includes all affiliate companies, parent companies, distributors, agents, representatives and any other persons or entities that either control STMicroelectronics, Inc. or are controlled by STMicroelectronics, Inc., including any entities STMicroelectronics, Inc. shares information electronically through an enterprise resource management system.

DISCOVERY REQUESTS

INTERROGATORY NO. 16: **Identify** all persons who designed, in whole or in material part, the manufacturing process for each **STPOWER SiC MOSFET**, and for each such person state the part(s) of the process they designed, in whole or in part.

ANSWER:

INTERROGATORY NO. 17: Identify all customers who purchased **STPOWER SiC MOSFETs** from **STMicroelectronics, Inc.** (“**Customers**”). For each **Customer**, provide:

1. The **STPOWER SiC MOSFETs** purchased;
2. The dates of each purchase;
3. The unit amount of each **STPOWER SiC MOSFET** purchased;
4. The total dollar amount of each **STPOWER SiC MOSFET** purchased;
5. The **Customer’s** reported, stated or otherwise identified application, or end use for the **STPOWER SiC MOSFETs**;
6. The **Identity** of any applications engineers employed (directly or indirectly) by **STMicroelectronics, Inc.** who worked with each **Customer**; and
7. The **Identity** of the persons at each **Customer** who made the decision to purchase **STPOWER SiC MOSFETs**.

ANSWER:

REQUEST FOR PRODUCTION NO. 10: Produce all **Testing Data** for **STPOWER SiC MOSFET(s)**.

ANSWER:

REQUEST FOR PRODUCTION NO. 11: Produce all **Testing Data** for SiC power devices manufactured or sold by any entities other than **STMicroelectronics, Inc.**

ANSWER:

REQUEST FOR PRODUCTION NO. 12: Produce all licenses between **STMicroelectronics, Inc.** and any other entity related, in whole or in part, to devices that include a SiC layer, region or area.

ANSWER:

REQUEST FOR PRODUCTION NO. 13: Produce any joint defense or common interest agreements that **STMicroelectronics, Inc.** claims covers any communications or documents related in whole or in part to **STMicroelectronics, Inc.** defense of this action or the prosecution of any action to invalidate any patent held by Plaintiff.

ANSWER:

Dated: June 20, 2022

Respectfully submitted,

By: /s/ Michael W. Shore

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***COUNSEL FOR PLAINTIFF
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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via e-mail on June 20, 2022.

/s/ Michael W. Shore _____

Michael W. Shore